

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
Northern DIVISION

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U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

Peter J. Smith

Plaintiff(s).

CIVIL ACTION NO. 2:19-cv-592-ALB-SMD

JURY DEMAND (MARK ONE)

☒ YES

☐ NO

v.

Subway Inc.
RSA Security
Retirement Systems of Alabama

Defendant(s).

*Dr David Bronner in his
official capacity as CEO
of the Retirement Systems of Alabama.*

COMPLAINT

1. Plaintiff(s) address and telephone number: Mr Peter J. Smith
P.O. Box 1644 Montgomery, Alabama 36102-1644
(334) 552-0683

2. Name and address of defendant(s): Subway - RSA Union Building
100 North Union Street Montgomery, AL 36104
RSA Security - 100 North Union Street, Montgomery, AL 36104

Retirement Systems of Alabama - 201 South Union Street
Montgomery, Alabama 36104

3. Place of alleged violation of civil rights: Subway at RSA Union Building
100 North Union Street Montgomery, Alabama 36104

4. Date of alleged violation of civil rights: June 6, 2019 and again on June 14, 2019

5. State the facts on which you base your allegation that your constitutional rights have been violated: Deprivation of rights under Color of Law, in violation
of 18 U.S.C. § 242. Violation was racial harassment of a
homeless Black male. This was in violation of the Civil
Rights Act of 1964 and also Shepard Byrd Act.
The Civil Rights Act of 1964 as it pertains to
race (Black) and sex (Male). (Please See Attachment
marked as "5A" and "5B")

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6. Relief requested: Plaintiff requests Compensatory and punitive damages for these intentional actions against myself occurring on two different dates one being the U.S. celebration of D-Day. The amount requested for these actions as well as retaliation, breach of a duty of care and emotional distress is \$20 million.

Date: 8-15-2019

Peter James Smith
Peter James Smith
Plaintiff(s) Signature

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Federal (2019) witness tampering occurred on June 6, 2019 and again within the Subway located at 100 North Union Street in Montgomery, Alabama 36104 on June 14, 2019 the RSA Union Building. There are two other complaints filed by myself concerning Regions Bank and Chick-fil-A both located at RSA Regions Tower 201 Monroe Street Montgomery, Alabama 36104. These acts were for that reason retaliation in addition to Federal witness tampering, racial profiling harassment and last but not least entrapment. On the D-Day celebration June 6, 2019 a white female sat a blue gatorade on the table I was having my subway purchased meal at. After the woman left the two black males claiming to be DTA Security dressed in white dress shirts and grey dress pants entered the subway and demanded I leave the building. This building is not a stand-alone building it houses other businesses some as the State of Alabama Ethics Commission which I have visited in the past.

(SA)

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On the second occasion occurring on June 14, 2019 I was offered a \$5 bill by a black female even though just like the first occasion on June 6, 2019 I had already purchased my Subway meal and was seated at my table, I refuse the \$5 just as I had refused the blue gatorade this time the black female said that she would be back she didn't leave the \$5 as the white female left the blue gatorade.

Just as had happened on June 6, 2019 the 2 Black Males who represented themselves as Retirement Systems of Alabama Security the Security tasked with securing the buildings belonging to the Retirement Systems of Alabama showed up and again demanded I leave the building thus the entrapment charge, and conspiracy to commit entrapment along with the other actors in this conspiracy.

2 counts each Federal witness tampering,
2 counts each conspiracy to commit entrapment,
2 counts each of entrapment, 2
counts each of obstruction of justice.

(5B).